

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

March 14, 2022

By ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Frank Babilonia
21 CR 576 (PAC)**

3/15/22
The matter is adjourned to May 4, 2022
at 11:30 am Time is excluded through May 4, 2022.
No release
Paul Patton
03/15/22

Dear Judge Crotty:

With the consent of the Government, I write to request an adjournment of Mr. Babilonia's status conference for approximately 45 days to the week of May 2, 2022 (with a preference for May 4, 5, or 6).

The parties are engaged in ongoing discussion towards a pretrial resolution and the defense will be submitting a formal mitigation package to the Government to aid in these discussions at the end of this week.

Progress towards a resolution had been stalled because I was in trial for 1.5 weeks and subsequently contracted COVID-19. The additional time requested would allow the parties to continue working towards a pretrial resolution and would provide an opportunity for me to meet with Mr. Babilonia once I have fully recovered and am cleared to enter the jail.

As noted above, the Government does not oppose this request. The Government requests the exclusion of time until the date of the next status conference. The defense consents.

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
917-612-2753 (c)

cc: AUSA David Robles.